## 30<sup>th</sup> Session of the Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCOE TDG) 4-12 (a.m.) December 2006 Summary of Proposals and Results

Note: This was the last of the TDG Sub-Committee's four meetings scheduled to be held during the 2005/2006 biennium. The main purpose for this meeting was to consider proposed amendments and updates to the UN Recommendations on the Transport of Dangerous Goods, also known as the UN Model Regulations. The amendments developed by the Sub-Committee during the four meetings in this biennium were submitted and approved at the 3<sup>rd</sup> session of the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals in December 2006. The amendments will be incorporated into the 15<sup>th</sup> Revised Edition of the UN Model Regulations and will be incorporated into the IMDG Code and ICAO TI from January 1, 2009.

*UN Papers for the 30<sup>th</sup> session may be downloaded from the UN Transport Division website at:* <a href="http://www.unece.org/trans/main/dgdb/dgsubc/c32006.html">http://www.unece.org/trans/main/dgdb/dgsubc/c32006.html</a>

Visit the website of the Office of Hazardous Materials Safety's Director of International Standards at:

http://hazmat.dot.gov/intstandards.htm for pertinent information relative to the office's international activities including: Schedules of International Meetings, The UN Recommendations on the Transport of Dangerous Goods (UN Model Regulation), The UN Committee and Sub-Committee of Experts on the Transport of Dangerous Goods, International Atomic Energy Agency International Maritime Organization's Dangerous Goods, Solid Cargoes and Containers (DSC) Sub-Committee, International Civil Aviation Organization (ICAO) Dangerous Goods Panel European Agreements Concerning the International Carriage of Dangerous Goods by Road (ADR) and Rail (RID) North American Free Trade Agreement (NAFTA) Hazardous Materials Land Transportation Standards Sub-Committee.

Paper #	Paper Title/Summary	Draft US Positions and Comments
	AGENDA ITEM 2 – PROPOSALS OF AMENDMENTS TO THE U	
2006/68	<b>Provisions concerning radioactive material</b> (Austria) – This paper	We did not oppose this proposal although we were not
	proposes to clarify the marking requirements for radioactive material	convinced it was necessary.
	transported under "exclusive use". In particular, it is proposed to	
	revise 5.3.2.1.1 (e) to read "Packaged radioactive material with a single	Result: The proposal was adopted.
	UN number required to be shipped under exclusive use in or on a	
	vehicle, or in a freight container."	
2006/70	Model Regulations on the Transport of Dangerous Goods Packing	The U.S. did not support the proposed revisions to P099
	<b>Instruction P099</b> (Australia) – This paper proposes to revise packing	because we felt it provided no improvements to the
	instructions P099 and IBC99 in order to emphasize the consignment	existing text. The addition of the words "for these
	requirements of 4.1.3.7 when a package that must be approved by a	goods" is unnecessary and the requirement for a copy of
	competent authority. The new proposed wording is as follows:	the approval to accompany the consignment is already in
		4.1.3.7. We felt the real problem may be that expressed
	"Only packagings which are approved <u>for these goods</u> by the	by IATA in INF.38.
	competent authority may be used (see 4.1.3.7). A copy of the	
	competent authority approval is to accompany each consignment or the	Result: The proposal was adopted.
	transport document includes an indication that the packaging was	
	approved by the competent authority."	
<b>INF.38</b>	Allocation of substances and articles to Packing Instruction P099	The U.S. supported this proposal and stated we would
	(IATA) In this paper IATA proposes that during the next biennium,	assist in the review process. The U.S. agreed that
	the assignment of Packing Instruction P099 in the Model Regulations	confusion arises when other regulations include
	be reviewed in light of the packaging authorizations in place for	provisions for certain materials that require an approval
	international road and/or air transport for the substances and articles	under P099 in the UNMR and IMDG Code. For
	identified.	example, Nitromethane UN 1261 is assigned to 173.202
		in the HMR. We supported work to compare the P099
		assignment in the UNMR against the modal and relevant
		nation regulations in the view of enhancing
		harmonization.
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		Result: The Sub-Committee agreed this could be
2006/71	C-learner (FICA) This grows are a 141117	considered as a subject of future work.
2006/71	Salvage packagings (EIGA) – This paper proposes to amend 4.1.1.17	The U.S. supported this proposal in principle but had
	and add a new section 6.2.1.1.9 titled "salvage packagings" to include	some concerns about the proposed text. For example, we
	requirements for salvage packagings designed and constructed for the	commented that a statement about training in this
	transport of packagings containing gases of Class 2.	provision was not appropriate for this section.

		Result: The proposal was not adopted; EIGA will readdress the issue in the next biennium.
2006/72	Container/vehicle packing certificate (section 5.4.2) (ICCA) – This paper proposes to amend 5.4.2.2 to allow the Container/Vehicle Packing Certificate to be signed with a facsimile signature. The paper also proposes to add a new paragraph 5.4.2.3, identical to 5.4.1.6.2, to allow the use of electronic data processing (EPD) or electronic data	The U.S. supported this proposal. The amendment aligns the text for the container packing certificate with the provisions for electronic signature and transfer that is authorized for the dangerous goods transport document.
	interchange (EDI) transmission techniques in the preparation of packing certificates. The proposed text is as follows: Add a new sentence at the end of 5.4.2.2: "Facsimile signatures are acceptable where applicable laws and regulations recognize the legal validity of facsimile signatures". Add a new subsection 5.4.2.3: "If the dangerous goods documentation is presented to the carrier by	Result: The proposal was adopted.
	means of electronic data processing (EDP) or electronic data interchange (EDI) transmission techniques, the signature(s) may be replaced by the name(s) (in capitals) of the person authorized to sign."	
2006/73	Amendment to P520 (ICCA) – This paper proposes to amend packing instruction P520 to allow solid substances assigned to OP7 and OP8 to be transported in plastic bags (5H4) with a maximum net mass of 50kg. The justification for this proposal is that other substances of PGII with comparable degree of hazard are permitted to be transported in 5H4 packaging.	The U.S. did not support this proposal in full. The proposal would allow solid organic peroxides and self – reactive substances (Types D and E) to be packed in 5H4 bags. This implies that 5H4 bags have the same level of strength as boxes (4A, 4B, 4G, etc.) and composite packagings with plastic inner receptacles (6HA1, 6HA2, 6HH2, etc.). No data was presented to support this proposal.
		Revised position: The U.S. supported the proposal if amended to only address Type F organic peroxides assigned to packing method OP8. These peroxides are currently authorized in IBCs and in tanks and have been shown not to pose a mass effect hazard.
		A revised note could be applied as follows to the OP8 authorization:
		For solid Type F peroxides, plastics bags (5H4) with a maximum net mass of 50 kg are also allowed.

		Result: The Sub-Committee felt there was insufficient data to support the proposal. The proposal was not adopted.
2006/74	Use of rubber polymers in packaging (Norway) — Rubber polymers are not listed in 6.1.2.6 as an acceptable packaging material. Therefore, it is proposed to extend the definition of "H: Plastics material" to include rubber. This paper proposes to add a note after the list in 6.1.2.6 to read as follows: "NOTE: Plastics, when used in connection with packagings for solids and articles, is taken to include other polymeric materials such as rubber, etc."	Norway brought this question to the last session. Most experts did not support the introduction of a new packaging code, but rather preferred to consider this material as a plastic polymer. The U.S. supported this approach to including rubber polymers under the packaging type H: Plastic materials.  Result: The proposal was adopted with minor
		amendments.
2006/75	<b>Transport of gases proposals to amend chapter 6.2</b> (Germany) – This paper includes three proposals related to the test, inspection, and	The U.S. was not opposed to this proposal.
	approval process required for pressure receptacles intended for the carriage of gases, including acetylene. The proposals are as follows:	Result: The proposal to amend 6.2.1.5.1 and 6.2.1.5.2 was adopted with some amendments. The proposal to rearrange the text of sections 6.2.1.4 to 6.2.1.6 was
	<ol> <li>Add a new paragraph (e) to 6.2.1.5.1 to include a check of the valves and other accessories.</li> <li>Revise 6.2.1.5.2 to require 6.2.1.5.1 (a), (c), and the new paragraph (e) as part of the inspection process for pressure receptacles intended for the transport of acetylene.</li> <li>Re-order 6.2.1.4, 6.2.1.5, and 6.2.1.6 to correspond with their actual chronological sequence (first approval, then initial inspection, then periodic inspection) and to require that the initial inspection and test be carried out "by an inspection body".</li> </ol>	also adopted, except for the additional text "by an inspection body".
2006/76	Assembly of packages by freight forwarders (IATA) – This paper proposes various amendments to clarify and define the role of the freight-forwarder when preparing an "overpack" and/or a "unit load." The paper suggests that the preparation of an "overpack" and a "unit load" should be considered separate activities and there should be guidance as to what functions a freight-forwarder may perform in the preparation of a "unit load" verses an "overpack". The paper also proposes editorial amendments to 5.1.2.1 regarding the "overpack" marking requirements.	The U.S. did not support introducing a separate category of compliance for freight forwarders. The UNMR is clear that whoever performs a specific function is responsible for compliance with the regulations. Proposal 4 of the paper seeks to limit the abilities of the freight forwarder to perform certain functions related to creating a unit load. We feel any person may perform any function for which they have received appropriate training and are capable of performing.

INF.7	Comments on ST/SG/AC.10/C.3/2006/76 (COSTHA)	We were also not in favor of the proposed revisions to the requirements for the overpack marking and transport document.  The U.S. generally supported COSTHA's comments.  Result: IATA withdrew the proposal. While there was some sympathy expressed to clarify the functions of freight forwarders, the general consensus was that any further definition of roles and responsibilities would likely lead to more difficulties rather than clarity.
2006/77	Limited quantities exemption for small quantities of pharmaceutical research and development substances (ICCA)(DGAC) – This paper proposes an exception for the transport of substances for pharmaceutical research and development due to the insignificant risk under any conditions of transport provided that the substances are classified as Division 6.1, Packing Group I, II, III; the net quantity per inner package is <= 0.2 g / 0.2 ml; and the aggregate quantity per package is <= 100 g / 100 ml.	The U.S. supported this proposal. The proposal takes into account comments made by the Sub-Committee at its previous session.  Result: The proposal was not adopted. Many experts felt that the material could be transported under the newly adopted Excepted Quantities provision without undue difficulties. Although, ICCA, DGAC, COSTHA, and others explained that these were micro-quantities of material in which there was not sufficient material present to do the classification testing; the majority of the Sub-Committee was unwilling to completely deregulate the material citing there are existing provisions for classification of samples.
2006/78	Provisions concerning the criteria for passing the vibration test for IBCs (Canada) – This paper proposes to revise 6.5.6.13.4.1 (criteria for passing the vibration test required for IBCs) to clarify that breakage of welds or frame structural components should constitute a test failure. The proposed revision is as follows:	The U.S. did not support the revised wording and favored maintaining the wording previously agreed to by the Sub-Committee which is as follows:  No leakage or rupture shall be observed.
	No leakage or rupture shall be observed. The IBC shall not exhibit any damage <u>such as, but not limited to, a breakage of structural components or welds</u> , liable to affect <u>the integrity of the IBC</u> during transport.	The U.S. recognized that the vibration test that is incorporated into the HMR would be slightly different than what was agreed to by the Sub-Committee. However, the U.S. proposal to include the vibration test in sequence was not accepted by the 29 <sup>th</sup> session of the

		Sub-Committee. The U.S. expressed their opinion that the vibration test is a severe test, even if performed on a separate sample from the other required tests. The U.S. felt the proposal by Canada to introduce the term "integrity" into the test acceptance criteria was subjective and would lead to greater difficulties in interpretation. The U.S. discussed with Canada the drafting of INF.30 as preferable text, but was still not convinced any additional test acceptance criteria was necessary.  Result: This proposal was discussed at length. The Sub-Committee ultimately adopted the proposal in Canada's INF.30 with a minor amendment (see INF.30).
INF.22	Provisions concerning the criteria for passing the vibration test for IBCs Comments on ST/SG/AC.10/C.3/2006/78 (ICPP) This paper opposes the Canadian proposal for the pass/fail criteria for the vibration test for IBCs and proposes that the wording simply state that "no leakage or rupture shall be observed".	The U.S. agreed with ICPP (see comments on 2006/78).
INF.30	Comments on UN/SCETDG/30/INF.22, ICPP (Canada)  In response to ICPP's comments, Canada proposes the following revised wording:  6.5.6.13.4.1 No leakage or rupture shall be observed. In addition, no breakage or failure of structural components, such as buckling, broken welds, failed fastenings, shall be observed.	Canada submitted this compromise text in an effort to bring in structural capability as a test acceptance criteria. The U.S. agreed with Canada that the vibration test was intended to address the packaging system, including integration of components, but maintained the originally agreed upon text was adequate.  Result: The revised wording proposed by Canada was adopted but the word "buckling" was deleted so that the adopted text reads as follows:  6.5.6.13.4.1 No leakage or rupture shall be observed. In addition, no breakage or failure of structural components, such as broken welds, failed fastenings, shall be observed.
INF.20	Vibration Test for IBCs (Canada/USA) This paper proposes to amend 6.5.6.13.3.2 by adding the following underlined text:  The test shall be conducted for one hour at a frequency that	U.S. proposal.  Result: A number of delegations commented on the proposed wording. An informal document from the

	causes the IBC to be raised from the vibrating platform to such a degree that a metal shim can be completely inserted at the maximum number of points under the IBC without the IBC going into resonance.  In addition, this paper proposes to add the following note after 6.5.6.13.3.2:  Note: For the purposes of 6.5.6.13.3.2, resonance means an uncontrolled response of the IBC to an increase in frequency.	UK (INF.54) served as a basis for the Sub-Committee to work from in developing acceptable text. After some additional work from interested experts, ultimately the following wording was adopted:  "The test shall be conducted for one hour at a frequency that causes the IBC to be momentarily raised from the vibrating platform for part of each cycle to such a degree that a metal shim can be completely inserted intermittently at at least one point between the base of the IBC and the test platform."
INF.48	Note on the work of the working group ISO/TC122/SC3/WG7 "Random Vibration Test" (ISO) This paper provided information to the Sub-Committee concerning amendments to the ISO/TC122 standard. ISO indicates they have received some proposals from Japan and CEN to revise the standard to take into account transport conditions. ISO indicates they are not committed to an immediate revision of the TC122 standard and asks for views of the Sub-Committee.	This paper contained no specific proposals.  Result: The Sub-Committee agreed that it would be inappropriate to encourage ISO to take further action to develop a random vibration standard. There was no interest expressed at this session to consider future amendments to the vibration test within the Model Regulations, which had only recently been adopted, and is specific to IBCs.
2006/79	Modification of the proposal ST/SG/AC.10/C.3/2006/42 to extend applicability of PP1 to some UN 3082 substances (CEPE) – This paper proposes to extend the application of special provision PP1 to include adhesives, printing inks, printing ink related products and resin solutions assigned to UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S. The proposed revised text is as follows:  PP1 For packagings adhesives, printing inks, printing ink related products, paints, paint related products and resin solutions which are assigned to UN 1133, UN 1210, UN 1263,UN 1866 or UN 3082, packing group II or III, packed in quantities of 5 litres or less per metal	The U.S. supported this proposal in principle with suggested editorial amendments. Other experts had similar suggestions as the U.S. on the text.  Result: The proposal was adopted with some minor editorial amendments.
2006/81	or plastics packaging, packagings are not required to meet the performance tests in Chapter 6.1  Packaging performance provisions concerning the drop test	The U.S. supported this proposal and agreed with DGAC
	(DGAC)(ECCR) – This paper proposes to reverse a decision by the USCOE TDG, at its 29 <sup>th</sup> session, to include specifications for the target surface when performing a drop test. Impact surface requirements may	that the inclusion of specific performance requirements for the impact surface was overly prescriptive. Of particular concern was the requirement for an impact

	vary considerably depending on the size and type of package and a number of existing laboratories may need to be retrofitted to meet the new requirements. Furthermore, this may invalidate previously approved packages.	surface mass of at least 50 times that of the heaviest package to be tested. The mass requirement may be acceptable for small packages, but is not realistic for IBC's and large packagings.  Result: The proposal to return to the 14 <sup>th</sup> Rev. Ed text was not adopted. Instead, clarifications to the text were adopted based on an informal proposal from France. The revised text was much more general in nature. The U.S. encourages industry to monitor and participate in the ISO Committee process as ISO considers changes to the relevant standard. It is likely France will remain interested in future efforts to further define the test surface through closer alignment to the ISO standard.
INF.35	Provisions concerning the drop test area (ICIBCA) This paper concurs with the DGAC informal paper in not adopting the more descriptive text agreed to by the UNSCOE regarding the drop test target surface.	The U.S. agreed with ICIBCA that the requirement is overly prescriptive and would prefer to maintain the language in the present model regulations (see discussion on 2006/81).
2006/82	Fuel cell cartridges containing division 2.1 substances (Canada) – This paper proposes to add two entries to the DGL of the UN Model Regulations for fuel cells and cartridges containing liquefied flammable gas and fuel cells and cartridges containing hydrogen in metal hydride. The proposal provides a description, testing, packaging and transport conditions. The paper proposes that fuel cells and cartridges transported under these entries should be subjected to a production leak test. As such, the paper proposes various amendments to incorporate this requirement, including new special provisions assigned to the entries and revision of Chapter 6.2 to extend its application to fuel cells and cartridges.	The U.S. worked directly with Canada in the drafting of this paper and supported the proposal as amended by INF.58.
INF.25	Changes to 2006/82 (Canada) Canada provides two options related to the provisions for cartridges containing hydrogen stored in a metal hydride. One option is to reference ISO TS 16111 and the other is a new special provision that incorporates the relevant testing provisions into the UNMR.	In INF.25, Canada clarified their intent that the provisions for the hydrogen stored in a metal hydride cartridge be limited to 120ml when using the newly proposed description. This was their intent all along and our understanding as well. This limit was what the USFCC/DGAC (2006/INF.15) and Canada (2006/INF.11) papers proposed at the last session. Units

		above this limit could still be transported as they are
INF.11	Fuel cell cartridges containing hydrogen in metal hydride (ISO) - In this paper ISO announces the publication of ISO/TS 16111:2006 Transportable gas storage devices — Hydrogen absorbed in reversible metal hydrides	today under UN3468.  There were no proposals in this paper. However, the U.S. expressed our gratitude for the work done by ISO to expedite the publication of this ISO TS. We expressed our interest in participating in the work to complete and publish the ISO standard, and the possible application of the standard to both large and small units in a future revision of the Model Regulations.
INF.58	Fuel cell cartridges containing hydrogen in a metal hydride - comments on ST/SG/AC.10/C.3/2006/82 (USA)- This paper responds to Canada's 2006/82 and expresses support for the option to include testing provisions for fuel cells containing hydrogen in a metal hydride in a special provision rather than by referencing the ISO Technical Specification (ISO TS). Amendments to the fire test and cycling tests are also proposed to align more closely with the ISO TS and to clarify the terms and procedures for the design type fire test and hydrogen cycling test.	The U.S. was originally interested in completing the work on the ISO technical specification and incorporating those detailed requirements into the Model Regulations. However, we did not feel the ISO TS has been fully vetted and all comments taken into account. Therefore, we supported incorporating the relevant testing into the UNMR. Additionally, the U.S. proposed two amendments to the testing provisions relevant to cartridges containing hydrogen stored in a metal hydride.  Result: The proposal was adopted.
INF.59	Changes to UN/SCETDG/30/INF.25 (USFCC) - In this paper the USFCC proposes that the maximum size limit proposed in paragraph 1 of UN/SCETDG/30/INF.25 be increased to authorize fuel cell cartridges containing hydrogen absorbed in metal hydride up to a maximum volume of 1 litre.	Result: There was no support for this proposal. The U.S. indicated it may be possible to revisit this issue after publication of the ISO standard, taking into account that all necessary provisions are incorporated into the standard.
2006/83	<b>New entries for lithium ion batteries</b> (IFALPA) – This paper is a continuation of ST/SG/AC.10/C.3/2005/45 and proposes new entries	The U.S. was not opposed to creating distinct descriptions for the various types of batteries, but was

		Result: The proposal was adopted to include a new entry for "lithium ion" batteries. Additionally, the existing entries of UN3090 and 3091 were amended to read "lithium metal" batteries.
2006/84	Note 2 to 2.1.3.5.5 firework classification (United Kingdom) – This paper proposes to amend 2.1.3.5.5 Note 2 to read as follows: "Flash composition" in this table refers to pyrotechnic compositions in powder form or as pyrotechnic units as presented in the fireworks which give a minimum time/pressure value of 4ms for 0.5g of pyrotechnic composition in Test Series 2(c)(i) "Time pressure test""	This proposal would make substantive changes to the definition of "flash composition" based on limited testing. The U.S. is currently conducting testing of various flash compositions and preferred to defer action on this subject until more test data was available.
INF.24	Comments on ST/SG/AC.10/C.3/2006/84 and INF.3 Note 2 to 2.1.3.5.5 Firework classification (Netherlands) This paper supports the UK proposal but offers some technical amendments related to defining "flash composition".	Result: An informal working group met to discuss the various proposals. It was generally agreed that in light of recent incidents, it was important to take immediate action and not delay a decision to the next
INF.31	Comments on ST/SG/AC.10/C.3/2006/84 (Canada) This paper provides additional technical comments on 2006/84 (flash composition).	biennium. The working group agreed to support additional testing as proposed by the UK and after considerable discussion agreed to take a more conservative approach by requiring an 8ms minimum time pressure value as opposed to a 4 ms value for .5g of pyrotechnic composition in the 2(c)(i) "Time /pressure test".
INF.3	Annex to document ST/SG/AC.10/C.3/2006/84 (United Kingdom) - This paper contains test results to support the UK's proposal in the above paper (2006/84).	There were no proposals in this paper.
2006/85	Model Regulations on the Transport of Dangerous Goods (United Kingdom) – This paper proposes to amend the definition of "freight container" to reflect the opinion of the UNSCE TDG, at its 29 <sup>th</sup> session, to remove the reference to the International Convention for Safe Containers (CSC). The paper proposes to move the reference to a note directly after the definition and to remove the last two sentences of the definition as follows:	The U.S. was not opposed to moving the reference to the International Convention for Safe Containers (CSC) to a note. However, the U.S. did not agree to delete last two sentences of the definition.  Result: The proposal was not adopted.
	Freight container means an article of transport equipment that is of a permanent character and accordingly strong enough to be suitable for repeated use; specially designed to facilitate the transport of goods, by one or other modes of transport, without intermediate reloading: and designed to be secured and /or readily handled, having fittings for these purposes., and approved in accordance with the International	

	Convention for Safe Containers (CSC), 1972, as amended. The term	
	"freight container" includes neither vehicle nor packaging. However a	
	freight container that is carried on a chassis is included. For freight	
	containers for the transport of Class 7 material, see 2.7.2.	
	Note: Freight containers should be approved in accordance with the	
	International Convention for Safe Containers (CSC), 1972, as amended".	
2006/87	Proposal of Amendments to the Model Regulations on the	The U.S. supported this proposal.
	<b>Transport of Dangerous Goods</b> (ISO) – This paper proposes to	
	change two existing ISO standard references in the UN Model	Result: The proposal was adopted.
	Regulations to the latest editions of those standards. In 5.2.2.2.1.2, the	
	references to ISO standard "7225:1994" should be revised to reference	
	"7225:2005". The newer edition of the standard has additional	
	guidance on label content and positioning which would be useful. In	
	the table in 6.2.2.4, the reference to ISO standard "10461:2005" should	
	be revised to reference "10461:2005/A1:2006". This standard has	
	been recently amended to provide additional guidance on the painting	
	and coating of cylinders manufactured from heat-treated alloys with	
	ageing.	
2006/88	<b>Provisions concerning radioactive material</b> (United Kingdom) –	The U.S. supported this proposal.
	This paper proposes minor consequential amendments to the entries for	
	UN 2908, UN 2909, UN 2910, and UN 2911 in the DGL based the	Result: The proposal was adopted.
	adoption of ST/SG/AC.10/C.3/2006/53 and INF.40 by the UN SCOE	
	TDG, at its 29 <sup>th</sup> session, which harmonizes the text for Class 7 in the	
	UN Model Regulations in relation to the IAEA Regulations.	
2006/89	Proposed amendment of lithium ion battery size limit in SP 188	This paper was withdrawn.
	(PRBA) – This paper proposes to increase the size limit in SP 188,	
	which excepts lithium ion batteries from the other provisions of the	
	UN Model regulations, to 150 Wh for road, rail, and sea transport	
	while retaining the existing limit of 100 Wh for air transport.	
2006/90	Classification of ammonium nitrate – based fertilizer (UN2067)	The U.S. supported this proposal. Calcium sulfate is as
	(EFMA) – This paper proposes to extend the application of SP 307	inert as calcium nitrate which is already included in SP
	paragraph (b) to ammonium nitrate based fertilizers containing calcium	307.
	sulfate. Test results and industry experience indicate that these	
	products have very similar safety characteristics to ammonium nitrate	Result: The proposal was adopted with a minor
	compositions based on calcium carbonate and/or dolomite.	amendment to ensure that the calcium sulfate was of
		mineral origin.

2006/91	Transport of infectious substances – Bulk animal carcasses (United Kingdom) – This paper proposes to include new UN numbers for the assignment of bulk animal carcasses or animal foodstuffs infected with pathogens of Category B, Category A affecting humans, and Category A affecting animals only. The paper suggests that the UN Model Regulations do not adequately address the transportation of animal carcasses in bulk. The paper also proposes to revise the existing entries for UN2900 and UN3373, 2.6.3.2.1, 2.6.3.5.1, 4.3.2.4.1,	The U.S. supported in principle to include provisions in the Model Regulations for the bulk transport of animal carcasses. The U.S. submitted a joint informal document with the UK on this issue (INF.28).  Result: This proposal was withdrawn in light of the proposals in INF.28.
INF.28	4.3.2.4.2 and add a new 2.6.3.2.2.3 as a consequence of the proposal.  Transport of infectious substances – Bulk animal carcasses - Comments on ST/SG/AC.10/C.3/2006/91 (UK/USA) This paper proposes to add bulk container authorizations for infectious substances contained in animal carcasses, animal parts, and animal foodstuffs. The paper presents an alternative approach to the UK's initial proposal in 2006/91 and precludes the need for new proper shipping names to be added to the Dangerous Goods List.	This was a joint U.SUK proposal.  Result: The proposal was adopted with minor amendments.
2006/92	Excepted quantities (United Kingdom) – This paper proposes to delete UN 1950 (aerosols), UN 2037 (receptacles small, containing gas), UN 2857 (Refrigerating machines) and UN 3164 (Articles, Pressurized, Pneumatic or Hydraulic) from the proposed list of substances permitted for transport in excepted quantities.	The U.S. supported this proposal. Aerosols and receptacles are already covered by an existing 50 ml exception, and refrigerating machines are not shipped in combination packagings and would therefore not be eligible for the EQ provisions. There is no need to apply the exception to pneumatic or hydraulic pressurized articles as such articles containing less than 30 ml of a Division 2.2 gas can still be considered excepted if meeting the applicable excepted quantity provisions for the gas itself.  Result: The proposal was adopted.
2006/93	Portable tank assignments for toxic by inhalation liquids (USA) — This paper proposes to revise the portable tank instructions and special provisions for various liquids that are considered to be toxic by inhalation. The proposal is based on an evaluation of the Dangerous Goods List and is in accordance with the Guiding Principles for assignment of portable tank instructions and special provisions agreed to by the UNSCOE.	U.S. Proposal.  Result: The U.S. revised the proposal to address only materials for which data was available from the Registry of Toxic Effects of Chemical Substances. The proposal was adopted as amended (see INF.73 and INF.74).
2006/94	<b>P200 special provision "d" for Silane</b> (USA) – This paper proposes to delete the references to special provision "d" in the packing provision column of packing instruction P200 for Silane (UN 2203)	U.S. Proposal.  Results: EIGA commented that there was a concern

2007/05	and to add a note to the end of 6.2.2.2 that reads as follows: "Note: The limitations imposed in ISO 11114-1 on high strength steel alloys at ultimate tensile strength levels up to 1100 MPa do not apply to Silane (UN 2203)" This proposal is based on specific test data previously provided by USA (UN/SCETDG/29/INF.21) which indicates that embrittlement of steel alloys does not occur in the presence of Silane when tested in accordance with ISO 11114-1.	regarding embrittlement. EIGA contended that the method used to produce the results submitted by the U.S. was not an appropriate test method although the method was authorized in the applicable ISO standard. They requested further time for the experts to discuss. However, the U.S. identified that this was an authorized test method for some time. The experts have been discussing this topic for years and this data was submitted to the last session. However, no data was presented by EIGA to indicate such embrittlement is occurring. Several experts expressed concern that the issue should be resolved at the ISO level before amending the Model Regulations. However the U.S. countered these claims and pointed out that no data had ever been presented to the contrary, expressing doubt as to whether any such data ever would be presented. The proposal was adopted.
2006/95	IBC Assignment for UN3475 (USA) – This paper proposes to add packing instruction "IBC02" to column 8 of the entry for ETHANOL AND GASOLINE MIXTURE or ETHANOL AND MOTOR SPIRT MIXTURE or ETHANOL AND PETROL MIXTURE, with more than 10% ethanol. In accordance with the Guiding Principles for amendments to the UN Model Regulations, Class 3, PG II, liquid substances should be assigned packing instruction IBC02.	U.S. Proposal.  Result: The proposal was adopted.
2006/96	<b>P200 filling ratio and working pressure amendments</b> (CGA) – This paper proposes to revise the filling ratio and working pressure values specified in packing instruction P200 for Tungsten Hexafluoride (UN 2196), Dichlorosilane (UN 2189), and Nitric Oxide, Compressed (UN 1660) based on an independent study commissioned with the U.S. National Institute of Standards and Technology (NIST).	The U.S. supported this proposal.  Result: The proposal was adopted.
2006/97	<b>Special provision 188 - lithium batteries</b> (USA) – This paper proposes to amend Special Provision 188 to enhance requirements for the packaging, marking, and documentation of excepted lithium ion cells and batteries in order to provide protection from leaks, short circuits, and mishandling during transportation. The paper also	U.S. Proposal.  Result: The proposal was adopted taking into account amendments resulting from the adoption of IFALPA's proposal (2006/83) and PRBA's proposals

	proposes to provide an indication on the package and accompanying documentation that special procedures should be followed during handling, transport, and in the event that the package is damaged.	in INF.63.
INF.63	Special provision 188 concerning lithium batteries - Comments on ST/SG/AC.10/C.3/2006/97 (PRBA) In this paper PRBA supports the US proposal in 2006/97 but proposes that an exception from marking and informal documentation be retained for packages containing not more than 4 individual cells or 4 individual batteries.	Result: The proposal was adopted however the quantity was reduced from four cells or batteries to no more than four cells or two batteries, and the exception was limited to batteries installed in equipment.
2006/98	Proposal to allow 1.4G and 1.4S fireworks in large packagings (USA) – This paper proposes to add packing instruction "LP102" to column 8 of the entries for FIREWORKS (UN 0336) and FIREWORKS (UN 0337).	This proposal was withdrawn.
2006/99	P200 Filling Ratio Amendments (USA) - This paper proposes to revise the filling ratio values specified in packing instruction P200 for various substances based on an independent study commissioned with the U.S. National Institute of Standards and Technology (NIST).  Correction to 2006/99 (USA)	U.S. Proposal.  In INF.29, the U.S. submitted a clarification that the original proposal included amendments to certain test pressures as listed in the Table of 2006/99.
<b>INF.29</b>		Result: The proposal was adopted.
INF.4	Annexes to document ST/SG/AC.10/C.3/2006/99 (USA) This paper contains the supporting data regarding the proposed filling ratios for liquefied gases as presented in 2006/99. The final NIST report (DTS56-02-X0049 dated November 2002) is included.	There were no proposals in this paper.
2006/100	General provisions 1.1.5: Exceptions for dangerous goods packed in limited quantities (UPU) – This paper proposes to revise 1.1.1.6 to clarify that Acts of the Universal Postal Union (UPU) Convention only permits the transportation of limited quantities of Category B Infectious Substances (UN 3373) in the international mail system. The paper also proposes to clarify that the UPU Convention only applies to international mail and that the provisions of the national postal authority or a competent authority applies to domestic mail.	The U.S. supported this proposal.  Result: The proposal was adopted with editorial amendments.
2006/101	Draft amendments to the Recommendations on the Transport of Dangerous Goods (Model Regulations and Manual of Tests and Criteria) - This document contains the draft amendments to the 14th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations (ST/SG/AC.10/1/Rev.14) and to the 4th revision of the Recommendations on the Transport of Dangerous Goods, Manual of	For reference only.

2006/103  Miscellaneous proposals (Secretaria) — This paper proposes to: 1) Fix an editorial problem with examples given in 3.2.2 regarding selection of a proper shipping name by removing erroneous references to the technical requirement. 2) Delete 6.7.4.14.5 regarding removal of the jacket and insulation during the inspection and test of non-vacuum insulated tanks as the requirement is already addressed in the last sentence of 6.7.4.14.4 3) Add a new 5.4.1.5.9 to clarify that an indication must appear on the transport document when portable tanks or IBCS are transported after the expiry of the last periodic test or inspection. The requirement appears in other sections of the Model Regulations but is not currently mentioned in the documentation requirements of Part 5. 4) Delete "or lithium equivalent content" in the definition of "Large cell" consistent with the removal of the term "lithium equivalent content" previously agreed to by the UNSCOE.  2006/103  Excepted quantities (Secretariat) — This paper proposes various amendments to the excepted quantity provisions that were adopted at the 29th session of the UNSCOE. See U.S. positions on the right for details on the changes proposed. These positions are in the order the comments are presented in 2006/103.  **Result: The proposal was adopted.**  The U.S. worked with the U.K (see INF.32) to propose a separate column. The Sub-Committee agreed to use the code "E0" to identify when the excepted quantities provision was not authorized. It was also decided to change the limited quantity provision was not authorized (change from the use of "NONE").  -The U.S. agreed that a footnote should appear in 3.5.1.2 specifying that for gases the volume indicated is a water capacity limit.  Result: The proposal was adopted.  -The U.S. agreed that some clarification was needed with respect to the limit for Division 5.2 substances in chemical/first aid kits, and worked with the U.K. (see		Tests and Criteria (ST/SG/AC.10/11/Rev.4 as amended by document	
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INIH 4 / LTO OTTOY ON OLIGINATIVE PROPOSAL TO OMOBIL VIDES			INF.32) to offer an alternative proposal to amend SP251.

		Result: This proposal along with the amendment proposed in INF.32 was adopted.
		-The U.S. was not convinced that there was a substantive problem with the marking agreed to by the UN SCOE. However, we realize the difficulties for others with English text markings; therefore, we were not opposed to considering the use of a symbol as suggested in INF.32.
		Result: The UK-proposed symbol/marking was adopted. It was agreed that the words "Dangerous Goods in Excepted Quantities" should not appear in the marking. It was also agreed that the text "Class or Division" should not be permitted in the marking, and that only the number of the Class or Division itself should appear. Further, the hatching and symbol shall be of the same color (either black or red) on a white or suitable contrasting background.
		-The U.S. did not oppose clarification of the term "transport unit" as used in 3.5.1.6.
		Result: The term was clarified to stipulate the types of transport units to which the limit would apply.
		The U.S. did not believe there was a problem with the text adopted in relation to the addition of the words "dangerous goods in excepted quantities" to the transport document when one is used. This would simply mean that for modes requiring documentation, such an indication must appear.
		Result: No substantive changes were made in this regard.
INF.32	Excepted quantities (UK)	The U.S:
	This paper corrects an error in the United Kingdom's formal document	- supported amendments to the substances
	ST/SG/AC.10/C.3/2006/92, comments on some issues raised by the	permitted as excepted quantities consistent with
	Secretariat in document ST/SG/AC.10/C.3/2006/103 – in some cases	the ICAO TI;

proposing solutions – and proposes amendments to the texts adopted by the Sub-Committee as a result of discussions during the recent ICAO DGP meeting.

- supported the amendment to the special provision for chemical kits to allow organic peroxides as excepted quantities in such kits;
- supported the clarification of the quantity authorized for gases being the "water capacity" of the receptacle;
- supported adding a new column to the DG;
- agreed with the text previously adopted with respect to he marking of transport units and documentation:
- supported the addition of a requirement that dangerous goods in excepted quantities packaged together and assigned to more than one EQ Code be limited to the outer packaging quantity of the most restrictive Code;
- did not oppose the use of a symbol.

Result: These proposals were adopted, except that it was agreed to use the Code E0 instead of the word "None". Additionally, the marking proposed by the UK was adopted with some amendments (see discussion on 2006/103).

## AGENDA ITEM 4 - IMPROVEMENT OF HAZARD COMMUNICATION

## Systematic approach for colours and appearance of pictograms (placards) according to the GHS classification (CTIF) – This paper is a follow up to CTIF's earlier efforts to standardize pictograms and colors used in labels. This paper contains no specific proposals but rather invites comments from the SCOE on the following guiding principles for the selection of pictograms (labels) for the transportation of dangerous goods. The principles, as proposed, include the following recommendations:

- 1. As an indicator for gases a gas-cylinder should be shown on all pictograms representing gas;
- 2. Only white symbols should appear on black, green, red and blue background; and
- 3. Deeply refrigerated, liquefied gases should be considered as an endpoint and communicated accordingly.

The U.S. noted that the UNSCOE had earlier decided that the existing labeling system should only be amended if an appropriate cost/benefit analysis were carried out. CTIF's proposal contained no such analysis and did not include any specifics on resulting changes to the existing labels based on their proposed principles. The U.S. did not support a comprehensive review of the existing labels but was willing to review any specific changes proposed by CTIF in the upcoming biennium on a case by case basis.

Result: There was no support for this proposal. Although CTIF was not proposing a specific amendment in this paper, they did suggest three possible issues for discussion. Several delegations

expressed reservations over further amendments to
the existing hazard communication system. The Sub-
Committee felt that the system proposed may be too
complicated by requiring too much information on
the label and placard.

	AGENDA ITEM 5 - GUIDING PRINCIPLES FOR THE MODEL	REGULATIONS
2006/69	Assignment of duties to persons involved in the transport of	The U.S. did not support Austria's previous proposal to
	dangerous goods (Austria) – At the SCOE's previous (29 <sup>th</sup> ) session,	remove all references to assignments of responsibility
	Austria proposed to delete all assignments of responsibility within the	within the UN Model Regulations. We did not oppose
	Model Regulations consistent with Austria's view of the intent of	this revised proposal which essentially clarifies that the
	1.1.1.3 which leaves such assignments to the competent authority. The	Regulations may contain guidance on such assignments
	SCOE generally agreed however that it was useful to retain such	in certain instances.
	guidance and some members agreed that 1.1.1.3 may need to be	
	revised to reflect this opinion. Austria proposes to revise the text as	Result: The proposal was not adopted.
	follows:	
	In certain parts of these Regulations, a particular action is prescribed,	
	but the responsibility for carrying out the action is not specifically	
	assigned to any particular person. Such responsibility may vary	
	according to the laws and customs of different countries and the	
	international conventions into which these countries have entered.	
	This does not preclude that these Regulations contain guidance for	
	such assignment to be used by international and national legislators.	
	For the purposes of these Regulations, it is not necessary to make this	
	assignment, but only to identify the action itself. It remains the	
	prerogative of each government to assign this responsibility.	
2006/86	Guiding principles for the model regulations (United Kingdom) –	The U.S. supported this proposal.
	This paper is a continuation of ST/SG/A.10/C.3/2006/48 and contains	
	the revised consolidated text of the guiding principles on the	Result: The proposal was adopted.
	development of the UN Model Regulations. The proposed text	
	includes introductory paragraphs to explain the purpose of the	
	document, revised text based on written comments received, and	
	corrections to the text based on decisions taken by the UN SCOE TDG	
	at its 29 <sup>th</sup> session. The paper also proposes to place the Guiding	
	Principles on the UNECE website with the 15 <sup>th</sup> edition of the UN	
INF.6	Model Regulations.  Corrigondum to ST/SC/A C 10/C 3/2006/86 (United Kingdom)	
IINT .U	Corrigendum to ST/SG/AC.10/C.3/2006/86 (United Kingdom) - This paper notes an error in the Table of Limited Quantities presented	
	in the above paper (2006/86). An amended table is provided.	
	AGENDA ITEM 7 – OTHER BUSINESS	
INF.10	Chemically unstable gases (Germany) - This paper proposes to	The U.S. has consistently stated that this is not an issue
11.11.10	establish an informal intersessional working group on chemically	for the TDG Sub-Committee. The issue of chemical
	Common an informal intersessional working group on enclineary	Tor the TDO 500-Committee. The issue of cheffical

	unstable gases. The SCOE is invited to approve the proposed terms of reference, schedule and course of action.	instability (in terms of the potential to decompose or polymerize) is not limited to gases. Many other chemicals are known to have this property and are adequately addressed in TDG regulations.  At the July 2007 session, several experts agreed that the chemical instability of gases could result from many different factors and it would be difficult to define a comprehensive criteria. Experts also generally agreed that transport conditions were properly accounted for, but that hazard communication for other sectors may not be properly addressed. Germany is pursuing an intersessional informal working group to further examine this issue. The U.S. is opposed to further work on this but is prepared to participate if necessary.
		Result: The U.S. opposed establishing a formal working group on this subject. Other delegations expressed that the work was not a high priority but did not specifically oppose the proposal. Many experts stated this work was of interest to GHS, and since TDG was the focal point for physical hazards,
		the TDG was obligated to continue this work under the direction of the GHS. The proposal was adopted and we expect Germany to host a working group meeting in early 2007.
INF.14	<b>Draft table of correspondence</b> (Secretariat) - This paper contains a draft table of correspondence between paragraph numbers in the IAEA Regulations for the Safe Transport of Radioactive Material, (2005 Edition), and the Recommendations on the transport of dangerous goods as amended according to ST/SG/AC.10/C.3/58/Add.2.	Result: The revised table was reviewed and approved by the Sub-Committee.
INF.17	<b>Bottom lift test</b> (ICPP) – This paper notes that a decision of the Sub-Committee with respect to the wording of the bottom lift test has not been correctly noted in the Secretariat's Draft amendments to the Recommendations on the Transport of Dangerous Goods (ST/SG/AC.10/C.3/2006/101). The paper proposes to delete the words " there is no observable permanent deformation of the IBC, including the base pallet" in paragraph 6.5.6.5.5 (a) in document ST/SG/AC.10/C.3/2006/101.	Result: The proposal was withdrawn.

INF.33	P200 filling ratio amendment for UN 2676 (stibine) (CGA) This paper proposes an amendment to special packing provision "z" to address the possible decomposition of gas mixtures containing stibine by requiring that if complete decomposition occurs, two thirds of the test pressure of the receptacle shall not be exceeded. The amended provision would read as follows:  Mixtures containing UN 1911 diborane or UN2676 stibine shall be filled to a pressure such that, if complete decomposition of the diborane or stibine occurs, two thirds of the test pressure of the pressure receptacle shall not be exceeded.	The U.S. supported this proposal.  Result: The proposal was adopted.
INF.23	Harmonization of Limited Quantities (AHS) In this paper AHS proposes that the sub-committee include limited quantities in its work program for the upcoming 2007-2008 biennium.	The U.S. is supportive of continuing to evaluate ways to improve the current situation (i.e. modal differences) with respect to limited quantities.  Result: The proposal was adopted to include this issue on the future work program.
INF.26	Transport of radioactive material (Secretariat) In this paper the Secretariat informs the Sub-Committee that the International Atomic Energy Agency (IAEA) circulated, on 14 November 2006, a draft security guide entitled "Security of Radioactive Material during Transport" to its Member States for comments to be submitted by 120 days from the date of the note.	The U.S. is evaluating the draft security guide and will provide comments to IAEA.  Result: The Sub-Committee took note of that there are a number of differences between the draft IAEA document and the security provision in the UNMR. Experts were invited to coordinate with their respective IAEA representatives to minimize differences where possible.
INF.27	Amendment of UN 3474 for inclusion of 1-HOBt Monohydrate (USA) This paper proposes to amend the proper shipping name for UN 3473 to include the monohydrate form of HOBt as follows:  "1-HYDROXYBENZOTRIAZOLE, ANHYDROUS, WETTED with not less than 20% water, by mass or 1-HYDROXYBENZOTRIAZOLE, MONOHYDRATE".  Test data to support this classification is included.	U.S. proposal.  Result: The proposal was not adopted on a vote of 5-4. The U.S. proposal stated that we had reviewed test data including the Time/Pressure Test (1 (c) (i) Test), BAM Friction Test (3(b) Test), Thermal Stability Test (3(c) Test), Small Scale Burning Test (3(d) Test), Stack Test (6(B), and Bonfire Test (6(c) Test). Results of these tests show that 1-HOBt Monohydrate does not meet the definition of a Class 1 material.  Nevertheless, several delegations expressed concern

		over the lack of specific data on the results of an external fire test and indicated they did not have sufficient time to evaluate the proposal. The U.S. will prepare a revised proposal for the next biennium.
INF.8	Application for consultative status by the International	The U.S. was not opposed to granting consultative status
	Organisation of Aluminium Aerosol Container Manufacturers	to these organizations.
	(AEROBAL) (Secretariat)	
INF.9	Application for consultative status by the European Bitumen	Result: AEROBAL, EUROBITUME, and RCMASA
	Association (EUROBITUME) (Secretariat)	were welcomed as observers. The Sub-Committee felt
<b>INF.13</b>	Application for consultative status by the Responsible Container	that IAPRI's application was incomplete and they
	Management Association of Southern Africa (RCMASA)	could not take a decision on their application.
	(Secretariat)	
<b>INF.16</b>	<b>Application for consultative status by the International Association</b>	
	of Packaging Research Institutes (IAPRI) (Secretariat)	